

Megan Virga, Esq. [SB#224820]
Law Office of John E. Virga, Inc.
721 11th Street
Sacramento, CA 95814
Telephone: (916) 444-6595
Facsimile: (916) 444-3318
megan@virgalawfirm.com

Ronald J. Peters, Esq. [SB#45749]
901 H Street, Suite 611
Sacramento, CA 95814
Telephone: (916) 322-2472
Facsimile: (916) 322-3208
ronslaw207@sbcglobal.net

Attorneys for Defendant
Armando Christopher Tabarez

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARMANDO CHRISTOPHER TABAREZ,

Defendants.

CASE NO. 2:21-CR-0211 TLN

STIPULATION AND ORDER REGARDING
TEMPORARY RELEASE OF DEFENDANT TO
ATTEND FAMILY FUNERAL

STIPULATION

On July 23, 2022, the step-father of Armando Christopher Tabarez, Robert R. Aguilera, passed away from pancreatic cancer. Robert Aguilera was the man who raised Mr. Tabarez and the father he had during his entire childhood. Mr. Tabarez has remained close to his step-father, Robert Aguilera, throughout his entire life. The death of Robert Aguilera is a significant and deep loss for Mr. Tabarez.

The Funeral services for Robert Aguilera are scheduled to begin at 12:00 p.m. (family escorting body into church at 11:00 a.m.) on August 12, 2022, at St. Robert's Catholic Church located at 2243 Irvin Way, Sacramento, CA 95822.

The defendant, Armando Christopher Tabarez, is respectfully requesting to be temporarily released from custody on August 12, 2022, sometime between 8:00 a.m. and 9:00 a.m., to the custody of

Licensed Private Investigator, James Williams and returned to the Colusa County Jail no later than 7:00 p.m. on August 12, 2022. He would travel between Colusa County and Sacramento County for the purpose of escorting the body, attending the viewing, mass and funeral services of Robert Aguilera.

It is hereby stipulated and agreed between plaintiff, United States of America, and defendant, Armando Tabarez, through their attorneys, pursuant to 18 U.S. C. 3142(i), that Mr. Tabarez may be temporarily released from custody as set forth below to attend the viewing, mass and funeral services on August 12, 2022.

The parties agree that the Court may order Mr. Tabarez be temporarily released sometime between 8:00 a.m. and 9:00 a.m. on August 12, 2022, to the custody of Licensed Private Investigator James Williams with instructions that he return to the Colusa County Jail no later than 7:00 p.m. the same day. The parties request the Court to direct the U.S. Marshall Service to coordinate Tabarez's release and surrender with the jail as they see fit, within the time frame permitted above. Mr. Tabarez has signed the attached Notice to Defendant Being Released (modified to fit the conditions of this temporary release) which is being filed with this stipulation. Mr. Tabarez has advised counsel of record that he understands all the terms and conditions of his temporary release.

Investigator Williams will transport Mr. Tabarez to and from St. Robert's Catholic Church located at 2243 Irvin Way, Sacramento, CA. Investigator Williams will at all times remain with Mr. Tabarez and will immediately notify Assistant United States David Spencer and Pretrial Services if Mr. Tabarez is non-complaint with the conditions of release.

Respectfully submitted,

Dated: August 3, 2022

/s/ RONALD JAMES PETERS

RONALD JAMES PETERS

Counsel for Defendant

ARMANDO CHRISTOPHER

TABAREZ

Dated: August 3, 2022

/s/ MEGAN VIRGA

MEGAN VIRGA

Counsel for Defendant

ARMANDO CHRISTOPHER

TABAREZ

Dated: August 3, 2022

PHILLIP A. TALBERT
United States Attorney

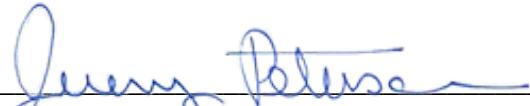
/s/ David Spencer
David Spencer
Assistant United States Attorney

ORDER

Armando Tabarez is ordered temporarily released from custody sometime between 8:00 a.m. and 9:00 a.m. on August 12, 2022, to the custody of Investigator James Williams, and is further ordered to surrender himself to the Colusa County Jail no later than 7:00 p.m. that same day. The U.S. Marshal Service is directed to make necessary arrangements with Colusa County Jail for Mr. Tabarez's temporary release and surrender. Investigator Williams shall remain with Tabarez at all times and shall immediately notify Pretrial Services and AUSA David Spencer if Tabarez is non-compliant with any condition of release. Mr. Tabarez has signed the attached Notice to Defendant Being Released and has advised counsel of record that he understands all the terms and conditions of his temporary release. All conditions set forth in that notice are hereby ordered.

IT IS SO ORDERED.

Dated: August 5, 2022


The Honorable Jeremy D. Peterson
UNITED STATES MAGISTRATE JUDGE